

REMARKS

Claims 20, 28, 48-50, 52-54 and 63-68 are cancelled, claims 1, 8-10, 19, 27, 51, 55-56, 61 and 69 are amended, and claims 1-19, 21-27, 29-47, 51, 55-62 and 69-76 remain in the application for consideration. In view of the following remarks, Applicant respectfully requests that the application be forwarded onto issuance.

Examiner Communication

Applicant would like to thank Examiner Shin for her time in discussing this application over the phone on October 17 and November 16, 2006. Although no agreement was reached, her comments and suggestions have been considered in crafting this response.

§ 103 Rejections

Claims 1-19, 21-28, 39-47, 56-62 and 69-71 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent Pub. No. 2001/0031066 to Meyer et al. (hereinafter "Meyer") in view of U.S. Patent No. 6,549,922 to Srivastava et al. (hereinafter "Srivastava").

Claims 29-34, 36-38 and 55 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,553,379 to Jaeger et al. (hereinafter "Jaeger") in view of U.S. Patent No. 6,704,748 to Sukanuma.

Claims 35 and 51 stand rejected under 35 U.S.C. § 103(a) as being obvious over Jaeger in view of Sukanuma and further in view of Srivastava.

Claims 72-76 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,345,256 to Milsted et al. (hereinafter "Milsted").

1
2 **The Claims Rejected over Meyer and Srivastava**

3 **Claim 1** is amended, and as amended recites a method of processing media
4 content comprising [added language is indicated in bold italics]:

- 5
- 6 • receiving a physical ID that corresponds to a specific media upon which
content resides that can be experienced by a user;
 - 7 • ***attempting to map the physical ID to a logical ID;***
 - 8 • ***if no logical ID is found that corresponds to the physical ID,***
9 ***attempting to establish a logical ID for the physical ID by causing a***
10 ***Wizard user interface (UI) to be presented to a user via a client***
11 ***computer so that information pertaining to the user's specific media***
12 ***can be collected from the user; and***
 - 13 • ***if a logical ID is found that corresponds to the physical ID,*** searching a
14 database that contains metadata associated with the specific media by
15 using the logical ID as a basis for a search query, wherein different
16 instances of a specific media with the same content thereon are
17 associated with different physical IDs that are mappable to the same
18 logical ID.

19 In making out the rejection of this claim, the Office argues that its subject
20 matter is obvious over Meyer in view of Srivastava. However, Applicant has
21 amended the claim and submits that the combination of cited references fails to
22 render this claim obvious for at least the reason that the cited references fail to
23 disclose or suggest all of the features of this claim.

24 Specifically, neither reference discloses or suggests at least the features of:

- 25
- 26 • ***attempting to map the physical ID to a logical ID;***
 - 27 • ***if no logical ID is found that corresponds to the physical ID,***
28 ***attempting to establish a logical ID for the physical ID by causing a***
29 ***Wizard user interface (UI) to be presented to a user via a client***
30 ***computer so that information pertaining to the user's specific media***
31 ***can be collected from the user....***

1
2 In its arguments rejecting former claim 28, the Office argues that Meyer
3 discloses a feature similar to this one. The Office states that

4
5 Meyer discloses...attempt[ing] to establish a logical ID for the physical ID
6 by causing a Wizard user interface (UI) to be presented to a user via a client
7 computer so that information pertaining to the user's specific media can be
8 collected from the user. Office Action at page 23.

9
10 The Office then cites to Meyer at paragraph 7, lines 12-15, and paragraph
11 31, lines 12-16, as disclosing this particular feature. These sections of Meyer are
12 excerpted below for the convenience of the Office:

13
14 The server, in turn, maps the identifier to an action, such as returning
15 metadata, re-directing the request to one or more other servers, requesting
16 information from another server to identify the media object, etc. Meyer at
17 paragraph 7, lines 12-15.

18
19 If the user is interested in purchasing the link, he or she can then enter input
20 (e.g., click on a button such as "Get Link") that initiates the process of
21 registering an OID with the object and associating metadata or actions with
22 the OID. Meyer at paragraph 31, lines 12-16.

23
24 After reviewing these sections, and in point of fact the rest of Meyer,
25 Applicant submits that this feature of the present claim is simply absent from
Meyer. The sections excerpted above merely discuss mapping an "identifier to an
action" and the process of registering an object ID (OID) and associating an OID
with metadata or actions. Nowhere in these sections or elsewhere does Meyer
disclose or suggest the above-mentioned feature.

1 Accordingly, and for at least this reason, the combination of cited
2 references fails to render this claim obvious and this claim is allowable.

3 **Claims 2-7** depend from claim 1 and are allowable as depending from an
4 allowable base claim. These claims are also allowable for their own recited
5 features which, in combination with those recited in claim 1, are neither disclosed
6 nor suggested by the references cited and applied by the Office.

7 **Claim 8** is amended, and as amended recites a server comprising [added
8 language is indicated in bold italics]:

- 9
- 10 • one or more processors;
- 11 • one or more storage devices; and
- 12 • software code resident on the one or more storage devices which, when
13 executed by the one or more processors, cause the processors to:
- 14 • receive a physical ID that corresponds to a specific media upon which
15 content resides that can be experienced by a user;
- 16 • ***attempt to map the physical ID to a logical ID;***
- 17 • ***if no logical ID is found that corresponds to the physical ID, attempt***
18 ***to establish a logical ID for the physical ID by causing a Wizard user***
19 ***interface (UI) to be presented to a user via a client computer so that***
20 ***information pertaining to the user's specific media can be collected***
21 ***from the user;***
- 22 • ***if a logical ID is found that corresponds to the physical ID,*** search a
23 database that contains metadata associated with the specific media by
24 using the logical ID as a basis for a search query;
- 25 • format the metadata in a XML schema; and
- return the formatted metadata to a client, wherein different instances of
a specific media with the same content thereon are associated with
different physical IDs that are mappable to the same logical ID.

22 In making out the rejection of this claim, the Office argues that its subject
23 matter is obvious over Meyer in view of Srivastava. However, Applicant has
24 amended this claim and submits that a *prima facie* case of obviousness with
25

1 respect to this claim cannot be established based on the cited combination of
2 references.

3 Specifically, and as discussed above, the cited references fail to disclose or
4 suggest at least the feature of:

- 5
- 6 • *attempting to map the physical ID to a logical ID;*
- 7 • *if no logical ID is found that corresponds to the physical ID,*
8 *attempting to establish a logical ID for the physical ID by causing a*
9 *Wizard user interface (UI) to be presented to a user via a client*
10 *computer so that information pertaining to the user's specific media*
11 *can be collected from the user....*

12 This feature is simply absent from the cited references. Accordingly, and
13 for at least this reason, the combination of cited references fails to render this
14 claim obvious and this claim is allowable.

15 **Claim 9** is amended, and as amended recites one or more computer-
16 readable media having computer-readable instructions thereon which, when
17 executed by a computer, cause the computer to [added language is indicated in
18 bold italics]:

- 19 • receive a physical ID that corresponds to a specific media upon
20 which content resides that can be experienced by a user;
- 21 • *attempt to map the physical ID to a logical ID;*
- 22 • *if no logical ID is found that corresponds to the physical ID,*
23 *attempt to establish a logical ID for the physical ID by causing a*
24 *user interface (UI) to be presented to a user via a client computer*
25 *so that information pertaining to the user's specific media can be*
collected from the user;
- *if a logical ID is found that corresponds to the physical ID,* search
a database that contains metadata associated with the specific media
by using the logical ID as a basis for a search query;
- format the metadata in a XML schema; and

- return the formatted metadata to a client, wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.

In making out the rejection of this claim, the Office argues that its subject matter is obvious over Meyer in view of Srivastava. However, Applicant has amended this claim and submits that a *prima facie* case of obviousness with respect to this claim cannot be established based on the cited combination of references.

Specifically, and as discussed above, the cited combination of references fails to disclose or suggest at least the feature of:

- *attempting to map the physical ID to a logical ID;*
- *if no logical ID is found that corresponds to the physical ID, attempting to establish a logical ID for the physical ID by causing a user interface (UI) to be presented to a user via a client computer so that information pertaining to the user's specific media can be collected from the user;*

This feature is simply absent from the cited references. Accordingly, and for at least this reason, the combination of cited references fails to render this claim obvious and this claim is allowable.

Claim 10 is amended, and as amended recites a method of processing media content comprising [added language is indicated in bold italics]:

- *attempting to map* a physical ID to a logical ID, the physical ID corresponding to a specific media associated with content that can be experienced by a user;
- *if no logical ID is found that corresponds to the physical ID, attempting to establish a logical ID for the physical ID by causing a user interface (UI) to be presented to a user via a client computer so*

1 *that information pertaining to the user's specific media can be*
2 *collected from the user;*

- 3 • *if a logical ID is found that corresponds to the physical ID*, using the
4 logical ID to query one or more databases that contain metadata
5 associated with the specific media; and
- 6 • returning metadata associated with the specific media to a client,
7 wherein different instances of a specific media with the same content
8 thereon are associated with different physical IDs that are mappable to
9 the same logical ID.

10 In making out the rejection of this claim, the Office argues that its subject
11 matter is obvious over Meyer in view of Srivastava. However, Applicant has
12 amended this claim and submits that a *prima facie* case of obviousness with
13 respect to this claim cannot be established based on the cited combination of
14 references.

15 Specifically, and as discussed above, neither reference discloses or suggests
16 at least the feature of:

- 17 • *if no logical ID is found that corresponds to the physical ID, attempt*
18 *to establish a logical ID for the physical ID by causing a user*
19 *interface (UI) to be presented to a user via a client computer so that*
20 *information pertaining to the user's specific media can be collected*
21 *from the user;*

22 This feature is simply absent from the cited references. Accordingly, and
23 for at least this reason, the combination of cited references fails to render this
24 claim obvious and this claim is allowable.

25 **Claims 11-18** depend from claim 10 and are allowable as depending from
an allowable base claim. These claims are also allowable for their own recited
features which, in combination with those recited in claim 10, are neither disclosed
nor suggested in the references cited and applied by the Office.

1 **Claim 19** is amended, and as amended recites [added language is indicated
2 in bold italics]:

- 3 • A method of processing media content comprising:
- 4 • receiving a physical ID that corresponds to a specific media
- 5 associated with content that can be experienced by a user;
- 6 • attempting to map the physical ID to a logical ID;
- 7 • if a logical ID is found that corresponds to the physical ID, searching
- 8 a database that contains metadata associated with the specific media
- 9 by using the logical ID as a basis for a search query;
- 10 • if no logical ID is found that corresponds to the physical ID,
- 11 attempting to establish a logical ID for the physical ID *by causing a*
- 12 *user interface (UI) to be presented to a user via a client computer*
- 13 *so that information pertaining to the user's specific media can be*
- 14 *collected from the user*, wherein different instances of a specific
- 15 media with the same content thereon are associated with different
- 16 physical IDs that are mappable to the same logical ID.

17 In making out the rejection of this claim, the Office argues that its subject
18 matter is obvious over Meyer in view of Srivastava. However, Applicant has
19 amended this claim and submits that a *prima facie* case of obviousness with
20 respect to this claim cannot be established based on the cited combination of
21 references.

22 Specifically, and as discussed above, neither reference discloses or suggests
23 at least the feature of:

- 24 • if no logical ID is found that corresponds to the physical ID,
- 25 attempting to establish a logical ID for the physical ID *by causing a*
- user interface (UI) to be presented to a user via a client computer*
- so that information pertaining to the user's specific media can be*
- collected from the user....*

1 This feature is simply absent from the cited references. Accordingly, and
2 for at least this reason, the combination of cited references fails to render this
3 claim obvious and this claim is allowable.

4 **Claims 21-26** depend from claim 19 and are allowable as depending from
5 an allowable base claim. These claims are also allowable for their own recited
6 features which, in combination with those recited in claim 19, are neither disclosed
7 nor suggested in the references cited and applied by the Office.

8 **Claim 27** is amended, and as amended recites a server computer
9 comprising [added language is indicated in bold italics]:

- 10 • one or more processors;
- 11 • one or more storage devices; and
- 12 • software code resident on the one or more storage devices which, when
13 executed by the one or more processors, cause the processors to:
 - 14 ▪ receive a physical ID that corresponds to a specific media
15 upon which content resides that can be experienced by a user;
 - 16 ▪ attempt to map the physical ID to a logical ID;
 - 17 ▪ if a logical ID is found that corresponds to the physical ID,
18 search a database that contains metadata associated with the
19 specific media by using the logical ID as a basis for a search
20 query; and
 - 21 ▪ if no logical ID is found that corresponds to the physical ID,
22 attempt to establish a logical ID for the physical ID *by*
23 *causing a Wizard user interface (UI) to be presented to a*
24 *user via a client computer so that information pertaining to*
25 *the user's specific media can be collected from the user,*
wherein different instances of a specific media with the same
content thereon are associated with different physical IDs that
are mappable to the same logical ID.

1 In making out the rejection of this claim, the Office argues that its subject
2 matter is obvious over Meyer in view of Srivastava. However, Applicant has
3 amended this claim and submits that a *prima facie* case of obviousness with
4 respect to this claim cannot be established based on the cited combination of
5 references.

6 Specifically, and as discussed above, neither reference discloses or suggests
7 at least the feature of:

- 8
- 9 • if no logical ID is found that corresponds to the physical ID, attempt
10 to establish a logical ID for the physical ID *by causing a Wizard*
11 *user interface (UI) to be presented to a user via a client computer*
12 *so that information pertaining to the user's specific media can be*
13 *collected from the user....*

14 This feature is simply absent from the cited references. Accordingly, and
15 for at least this reason, the combination of cited references fails to render this
16 claim obvious and this claim is allowable.

17 **Claim 39** recites a method of processing media content comprising:

- 18 • receiving a physical ID that corresponds to a specific media upon
19 which content resides that can be experienced by a user;
- 20 • attempting to map the physical ID to a logical ID, the logical ID
21 serving as a basis for a search query of a database that contains
22 metadata associated with the specific media;
- 23 • if no logical ID is found that corresponds to the physical ID,
24 attempting to establish a logical ID for the physical ID by causing a
25 Wizard user interface (UI) to be presented to a user via a client
computer so that information pertaining to the user's specific media
can be collected from the user, wherein different instances of a
specific media with the same content thereon are associated with
different physical IDs that are mappable to the same logical ID.

1 In making out the rejection of this claim, the Office argues that its subject
2 matter is obvious over Meyer in view of Srivastava. Applicant respectfully
3 disagrees and submits that the Office has failed to establish a *prima facie* case of
4 obviousness with respect to this claim.

5 Specifically, and as discussed above, the cited references fail to disclose or
6 suggest at least the feature of:

- 7
- 8 • if no logical ID is found that corresponds to the physical ID,
9 attempting to establish a logical ID for the physical ID by causing a
10 Wizard user interface (UI) to be presented to a user via a client
11 computer so that information pertaining to the user's specific media
12 can be collected from the user....

13 Accordingly, and for at least this reason, the Office has failed to establish a
14 *prima facie* case of obviousness with respect to this claim. This claim is
15 allowable.

16 **Claims 40-46** depend from claim 39 and are allowable as depending from
17 an allowable base claim. These claims are also allowable for their own recited
18 features which, in combination with those recited in claim 39, are neither disclosed
19 nor suggested in the references cited and applied by the Office.

20 **Claim 47** recites one or more computer-readable media having computer-
21 readable instructions thereon which, when executed by a computer, cause the
22 computer to:

- 23
- 24 • receive a physical ID that corresponds to a specific media upon
25 which content resides that can be experienced by a user;
 - attempt to map the physical ID to a logical ID, the logical ID serving
as a basis for a search query of a database that contains metadata
associated with the specific media;

- if no logical ID is found that corresponds to the physical ID, attempt to establish a logical ID for the physical ID by causing a Wizard user interface (UI) to be presented to a user via a client computer so that information pertaining to the user's specific media can be collected from the user, wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.

In making out the rejection of this claim, the Office argues that its subject matter is obvious over Meyer in view of Srivastava. Applicant respectfully disagrees and submits that the Office has failed to establish a *prima facie* case of obviousness with respect to this claim.

Specifically, and as discussed above, the cited references fail to disclose or suggest at least the feature of:

- if no logical ID is found that corresponds to the physical ID, attempt to establish a logical ID for the physical ID by causing a Wizard user interface (UI) to be presented to a user via a client computer so that information pertaining to the user's specific media can be collected from the user....

Accordingly, and for at least this reason, the Office has failed to establish a *prima facie* case of obviousness with respect to this claim. This claim is allowable.

Claim 56 is amended, and as amended recites a method of processing media content comprising [added language is indicated in bold italics]:

- receiving a physical ID that corresponds to a specific CD upon which content resides that can be experienced by a user;
- ***attempting to*** map the physical ID to a logical ID;
- ***if no logical ID is found that corresponds to the physical ID, attempting to establish a logical ID for the physical ID by causing***

1 *a user interface (UI) to be presented to a user via a client computer*
2 *so that information pertaining to the user's specific media can be*
3 *collected from the user;*

- 4 • *if a logical ID is found that corresponds to the physical ID,*
5 searching a database that contains metadata associated with the CD
6 by using the logical ID as a basis for a search query;
- 7 • formatting the metadata in a XML schema; and
- 8 • returning the formatted metadata to a client, wherein different
9 instances of a specific CD with the same content thereon are
10 associated with different physical IDs that are mappable to the same
11 logical ID.

12 In making out the rejection of this claim, the Office argues that its subject
13 matter is obvious over Meyer in view of Srivastava. However, Applicant has
14 amended this claim and submits that a *prima facie* case of obviousness with
15 respect to this claim cannot be established based on the cited combination of
16 references.

17 Specifically, and as discussed above, neither reference discloses or suggests
18 at least the feature of:

- 19 • *if no logical ID is found that corresponds to the physical ID,*
20 *attempt to establish a logical ID for the physical ID by causing a*
21 *user interface (UI) to be presented to a user via a client computer*
22 *so that information pertaining to the user's specific media can be*
23 *collected from the user....*

24 This feature is simply absent from the cited references. Accordingly, and
25 for at least this reason, the combination of cited references fails to render this
 claim obvious and this claim is allowable.

1 **Claims 57-60** depend from claim 56 and are allowable as depending from
2 an allowable base claim. These claims are also allowable for their own recited
3 features which, in combination with those recited in claim 56, are neither disclosed
4 nor suggested in the references cited and applied by the Office.

5 **Claim 61** is amended, and as amended recites a method of processing
6 media content comprising [added language is indicated in bold italics]:

- 7
- 8 • receiving a physical ID that corresponds to a specific DVD upon
9 which content resides that can be experienced by a user;
- 10 • ***attempting to map the physical ID to a logical ID;***
- 11 • ***if no logical ID is found that corresponds to the physical ID,***
12 ***attempting to establish a logical ID for the physical ID by causing***
13 ***a user interface (UI) to be presented to a user via a client computer***
14 ***so that information pertaining to the user's specific media can be***
15 ***collected from the user;***
- 16 • ***if a logical ID is found that corresponds to the physical ID,***
17 searching a database that contains metadata associated with the DVD
18 by using the logical ID as a basis for a search query;
- 19 • formatting the metadata in a XML schema; and
- 20 • returning the formatted metadata to a client, wherein different
21 instances of a specific DVD with the same content thereon are
22 associated with different physical IDs that are mappable to the same
23 logical ID.

24 In making out the rejection of this claim, the Office argues that its subject
25 matter is obvious over Meyer in view of Srivastava. However, Applicant has
26 amended this claim and submits that a *prima facie* case of obviousness with
27 respect to this claim cannot be established based on the cited combination of
28 references.

29 Specifically, and as discussed above, neither reference discloses or suggests
30 at least the feature of:

- *if no logical ID is found that corresponds to the physical ID, attempt to establish a logical ID for the physical ID by causing a user interface (UI) to be presented to a user via a client computer so that information pertaining to the user's specific media can be collected from the user....*

This feature is simply absent from the cited references. Accordingly, and for at least this reason, the combination of cited references fails to render this claim obvious and this claim is allowable.

Claim 62 depends from claim 61 and is allowable as depending from an allowable base claim. This claim is also allowable for its own recited features which, in combination with those recited in claim 61, are neither disclosed nor suggested in the references cited and applied by the Office.

Claim 69 is amended, and as amended recites a method of processing media content comprising [added language is indicated in bold italics]:

- generating a physical ID that corresponds to a specific media upon which content resides that can be experienced by a user on a client computer, wherein different instances of the specific media with the same content thereon are associated with different physical IDs that are mappable to a same logical ID;
- sending the physical ID to a server configured to return metadata associated with the specific media;
- *attempting to map the physical ID to a logical ID;*
- *if no logical ID is found that corresponds to the physical ID, attempting to establish a logical ID for the physical ID by causing a user interface (UI) to be presented to a user via a client computer so that information pertaining to the user's specific media can be collected from the user;*
- *if a logical ID is found that corresponds to the physical ID, searching a database that contains metadata associated with the specific media by using the logical ID as a basis for a search query;*

- receiving, from the server, XML-formatted metadata;
- parsing, with the client computer, the XML-formatted metadata; and
- displaying the metadata for the user on the client computer.

In making out the rejection of this claim, the Office argues that its subject matter is obvious over Meyer in view of Srivastava. However, Applicant has amended this claim and submits that a *prima facie* case of obviousness with respect to this claim cannot be established based on the combination of cited references.

Specifically, and as discussed above, neither reference discloses or suggests at least the feature of:

- *if no logical ID is found that corresponds to the physical ID, attempt to establish a logical ID for the physical ID by causing a user interface (UI) to be presented to a user via a client computer so that information pertaining to the user's specific media can be collected from the user....*

This feature is simply absent from the cited references. Accordingly, and for at least this reason, the combination of cited references fails to render this claim obvious and this claim is allowable.

Claims 70-71 depend from claim 69 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 69, are neither disclosed nor suggested in the references cited and applied by the Office.

The Claim Rejections over Jaeger and Suganuma

Claim 29 recites a method of processing media content comprising:

- receiving a physical ID that corresponds to a specific media upon which content resides that can be experienced by a user;
- attempting to map the physical ID to a logical ID by searching a first table containing physical ID-to-logical ID mappings using a first search;
- if the first search is unsuccessful, searching a second table containing physical ID-to-logical ID mappings using a second search; and
- if a logical ID is found that corresponds to the physical ID, searching a database that contains metadata associated with the specific media by using the logical ID as a basis for a search query, wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.

In making out the rejection of this claim, the Office argues that its subject matter is obvious over Jaeger in view of Suganuma. Applicant respectfully disagrees and submits that the Office has failed to establish a *prima facie* case of obviousness for at least the reason that the cited combination of references fails to disclose or suggest all of this claim's recited features.

Specifically, neither reference discloses or suggests at least the feature of:

- wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.

In point of fact, the Office has failed to present any argument as to how or where the cited references disclose or suggest this feature. Nevertheless, a search of both Jaeger and Suganuma reveals that this feature is neither disclosed nor suggested by these references.

1 Accordingly, and at least for this reason, the Office has failed to establish a
2 *prima facie* case of obviousness with respect to this claim. This claim is
3 allowable.

4 **Claims 30-34** depend from claim 29 and are allowable as depending from
5 an allowable base claim. These claims are also allowable for their own recited
6 features which, in combination with those recited in claim 29, are neither disclosed
7 nor suggested in the references cited and applied by the Office.

8 **Claim 36** recites a method of processing media content comprising:

- 9
- 10 • providing a canonical table containing physical ID to logical ID
- 11 mappings, the physical IDs being associated with specific media
- 12 containing content that can be experienced by a user, the logical IDs
- 13 being configured for use in database queries to locate metadata
- 14 associated with specific media;
- 15 • providing a table containing user-provided physical ID to logical ID
- 16 mappings;
- 17 • receiving a physical ID associated with a specific media;
- 18 • conducting a first low cost search of the canonical table to determine
- 19 whether there is a matching physical ID with a corresponding logical
- 20 ID;
- 21 • if the first low cost search is unsuccessful, conducting a second low
- 22 cost search of the table containing the user-provided physical ID to
- 23 logical ID mappings to determine whether there is a matching
- 24 physical ID with a corresponding logical ID;
- 25 • if the second low cost search is unsuccessful, conducting a third
- higher cost search of the canonical table to determine whether there
- is a matching physical ID with a corresponding logical ID; and
- if any of the searches are successful, using the corresponding logical
- ID to search a database containing metadata associated with the
- specific media, wherein different instances of a specific media with
- the same content thereon are associated with different physical IDs
- that are mappable to the same logical ID.

1 In making out the rejection of this claim, the Office argues that its subject
2 matter is obvious over Jaeger in view of Suganuma. Applicant respectfully
3 disagrees and submits that the Office has failed to establish a *prima facie* case of
4 obviousness with respect to this claim for at least the reason that the cited
5 references fail to disclose or suggest all of this claim's recited features.

6 As a preliminary matter, Applicant objects to the Office's assertion that
7 claim 29 and 36 encompass the same scope of the invention. The Office argues
8 that "claim 36 encompasses the same scope of the invention as that of...claim 29.
9 Therefore, claim 36 is rejected for same reason and motivation as...claim 29."
10 Office Action at page 32-33. While these claims may recite certain common
11 features, it is wholly inaccurate to maintain that the embodiments recited by the
12 respective claims encompass the "same scope of the invention."

13 As to the Office's *prima facie* case of obviousness, Applicant submits that
14 the cited references fail to disclose or suggest all of this claims recited features.
15 Specifically, neither Jaeger nor Suganuma disclose the features of:

- 16 • if the first low cost search is unsuccessful, conducting a second low
17 cost search of the table containing the user-provided physical ID to
18 logical ID mappings to determine whether there is a matching
19 physical ID with a corresponding logical ID;
- 20 • if the second low cost search is unsuccessful, conducting a third
21 higher cost search of the canonical table to determine whether there
22 is a matching physical ID with a corresponding logical ID; and
- 23 • if any of the searches are successful, using the corresponding logical
24 ID to search a database containing metadata associated with the
25 specific media, wherein different instances of a specific media with
the same content thereon are associated with different physical IDs
that are mappable to the same logical ID.

1 The Office argues that Jaeger discloses these features at column 4, lines 33-
2 46 and 50-56. However, this section of Jaeger merely discloses certain data
3 structures and the particular data contained in those structures. Jaeger further
4 discloses that the data records are assigned physical addresses of IDs that indicate
5 where the records may be found. Jaeger at column 4, lines 44-46. However,
6 nowhere in these sections or elsewhere does Jaeger disclose or suggest conducting
7 a second low cost search or even a third higher cost search. Further, nowhere does
8 Jaeger disclose *different instances* of a specific media with the *same content*
9 *thereon* are associated with *different physical IDs* that are mappable to the *same*
10 *logical ID*. These features are simply absent from the disclosure of Jaeger.
11 Accordingly, the cited references fail to teach all of this claim's recited features.

12 For at least the reasons discussed above, the Office has failed to establish a
13 *prima facie* case of obviousness with respect to this claim. This claim is
14 allowable.

15 **Claims 37-38** depend from claim 36 and are allowable as depending from
16 an allowable base claim. These claims are also allowable for their own recited
17 features which, in combination with those recited in claim 36, are neither disclosed
18 nor suggested in the references cited and applied by the Office.

19 20 **The Claim Rejections Over Jaeger, Suganuma and Srivastava**

21 **Claim 35** recites one or more computer-readable media having computer-
22 readable instructions thereon which, when executed by a computer, cause the
23 computer to:

- 24
25
- receive a physical ID that corresponds to a specific media upon which content resides that can be experienced by a user;

- attempt to map the physical ID to a logical ID by searching a first table containing physical ID-to-logical ID mappings using a first search, the first search comprising a low cost search;
- if the first search is unsuccessful, search a second table containing physical ID-to-logical ID mappings using a second search;
- if the second search is unsuccessful, search the first table using a third search, the third search comprising a higher cost search than the first search; and
- if a logical ID is found that corresponds to the physical ID, search a database that contains metadata associated with the specific media by using the logical ID as a basis for a search query, wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.

In making out the rejection of this claim, the Office argues that its subject matter is obvious over Jaeger in view of Suganuma and further in view of Srivastava. Applicant respectfully disagrees and submits that the Office has failed to establish a *prima facie* case of obviousness with respect to this claim for at least the reason that the cited reference fail to disclose or suggest all of this claim's recited features.

Specifically, none of the cited references discloses or suggests at least the features of:

- if the first search is unsuccessful, search a second table containing physical ID-to-logical ID mappings using a second search;
- if the second search is unsuccessful, search the first table using a third search, the third search comprising a higher cost search than the first search; and
- if a logical ID is found that corresponds to the physical ID, search a database that contains metadata associated with the specific media by using the logical ID as a basis for a search query, wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.

1
2 Among other features, the cited references fail to disclose or suggest the
3 possibility of *second* and *third searches* for physical ID-to-logical ID mappings
4 should previous searches prove unsuccessful. Nor do the references even mention
5 a “higher cost search”. Further, none of the cited references discloses the feature
6 of *different instances of a specific media* with the *same content thereon* being
7 associated with *different physical IDs* that are mappable to the *same logical ID*.
8 These features are simply missing from the cited references. The cited references,
9 either alone or in combination, fail to disclose or suggest all of this claims recited
10 features.

11 For at least the reasons discussed above, the Office has failed to establish a
12 *prima facie* case of obviousness with respect to this claim. This claim is
13 allowable.

14 **Claim 51** is amended, and as amended recites a system for providing
15 metadata to clients comprising [added language is indicated in bold italics]:

- 16
- 17 • a *trusted* canonical table comprising multiple physical IDs
18 associated with specific media containing content that can be
19 experienced by a user;
 - 20 • multiple logical IDs associated with the multiple physical IDs;
 - 21 • individual physical IDs being mapped to individual logical IDs;
 - 22 • *at least one other less trusted table containing multiple physical
23 IDs and multiple logical IDs, individual physical IDs being
24 mapped to individual logical IDs; and*
 - 25 • the logical IDs being configured for use in database queries to locate
metadata associated with specific media, wherein different instances
of a specific media with the same content thereon are associated with
different physical IDs that are mappable to the same logical ID.

1 In making out the rejection of this claim, the Office argues that its subject
2 matter is obvious over Jaeger in view of Suganuma and further in view of
3 Srivastava. However, Applicant has amended this claim and submits that a *prima*
4 *facie* case of obviousness cannot be established with respect to this claim based on
5 the cited combination of references.

6 Specifically, the cited references fail to disclose or suggest at least the
7 feature of:

- 8
9 • *at least one other less trusted table containing multiple physical*
10 *IDs and multiple logical IDs, individual physical IDs being*
11 *mapped to individual logical IDs....*

12 The Office cites to Jaeger as disclosing this particular feature. Office
13 Action at page 41. The sections of Jaeger cited by the Office are excerpted below.

14 With reference to FIG. 3, the structure of the data and lists will be described
15 below. In FIG. 3a the structure of an address data record is shown. Such an
16 address data record comprises all necessary address data, for example
17 name, prename, title, street, building number, zip code, city, telephone, fax,
18 e-mail, internet, country, birthday and notes. Of course an address data
19 record could comprise further information for example company name,
20 position etc. A plurality of such address data records is stored at determined
21 physical addresses in the storage means 12. These addresses (pointers) are
22 indicated in a list, which is shown in FIG. 3b. Each address data record is
23 signed to a physical address or identification number (ID) on the basis of
24 which the respective address can be found in the list shown in FIG. 3b.

25 As already mentioned, the interface 14 operates with logical addresses
which is the reason for keeping an assignment list (mapping list) between
logical addresses and physical addresses. This list is shown in FIG. 3c. In
this logical address management list each physical address and ID,
respectively, is assigned to a logical address and ID, respectively, which for
example are used when arranging subsets. For each assignment/mapping of
a physical ID to a logical ID an index about the use of an address by single

1 selectable operation menus is kept. The use is determined by a bitwise
2 addressing and is for data consistency. Jaeger at column 4, lines 33-57.

3 Applicant submits that nowhere in this section, and indeed the entirety of
4 Jaeger, is disclosed a *less trusted table*. Accordingly, and for at least this reason, a
5 *prima facie* case of obviousness cannot be established based on these references
6 and this claim is allowable.

7 **Claim 55** depends from claim 51 and is allowable as depending from an
8 allowable base claim. This claim is also allowable for its own recited features
9 which, in combination with those recited in claim 51, are neither disclosed nor
10 suggested in the references cited and applied by the Office.

11 12 **The Claim Rejections over Milsted**

13 **Claim 72** recites a method of providing metadata to a client comprising:

- 14
- 15 • establishing a table that contains user-provided entries that map
16 physical IDs to logical IDs, the physical IDs corresponding to
17 specific media upon which content resides that can be experienced
18 by various users, the logical IDs being configured for use in
19 querying one or more databases that contain metadata associated
20 with the specific media, the metadata being returnable to a client;
 - statistically evaluating the entries to determine, for each physical ID,
a most likely logical ID match; and
 - making the most likely logical ID match available so that it can be
used to query the one or more databases.
- 21

22 In making out the rejection of this claim, the Office argues that its subject
23 matter is obvious over Milsted. Applicant respectfully disagrees and submits that
24 the Office has failed to establish a *prima facie* case of obviousness for at least the
25 reasons that Milsted fails to disclose or suggest all of this claims recited features.

1 The sections of Milsted referred to by the Office as disclosing the subject
2 matter of this claim are excerpted below for the convenience of the Office:

3
4 It is an object of the present invention to remove the above-mentioned
5 drawbacks and to provide a system for tracking usage of content data. One
6 embodiment of the present invention provides a system for tracking usage
7 of digital content on user devices. Column 6, lines 34-38.

8
9 Additionally, a logging site that is coupled to the network tracks the playing
10 of the content data. In particular, the logging site receives play information
11 from the network, and the play information includes the number of times
12 that the content data has been played by the associated content player.
13 Column 6, lines 42-47.

14
15 The Clearinghouse(s) 105 maintains a Audit Logs 150 of information for
16 each operation that is performed during Content 113 purchase transactions
17 and report request transactions. The information can be used for a variety of
18 purposes such as audits of the Secure Digital Content Electronic
19 Distribution System 100, generation of reports, and data mining. Column
20 47, lines 47-53.

21
22 Applicant submits that nowhere in these sections or elsewhere does Milsted
23 disclose or suggest subject matter that even remotely resembles the subject matter
24 recited by claim 72. Milsted fails to mention a logical ID or a physical ID, much
25 less a statistical evaluation of entries to determine, for each physical ID, a most
likely logical ID match. The subject matter of this claim is simply absent from the
disclosure of Milsted.

Accordingly and at least for these reasons, the Office has failed to establish
a *prima facie* case of obviousness with respect to this claim. This claim is
allowable.

1 **Claims 73** depends from claim 72 and is allowable as depending from an
2 allowable base claim. This claim is also allowable for its own recited features
3 which, in combination with those recited in claim 72, are neither disclosed nor
4 suggested in the references cited and applied by the Office.

5 **Claim 74** recites a method of providing metadata to a client comprising:

- 6
- 7 • providing a table containing user-provided entries that map physical
8 IDs to logical IDs, the physical IDs corresponding to specific media
9 upon which content resides that can be experienced by various users,
10 the logical IDs being configured for use in querying one or more
11 databases that contain metadata associated with the specific media,
12 the metadata being returnable to a client;
- 13 • computing, from the table, a list of physical IDs that are to be
14 statistically evaluated;
- 15 • for each listed physical ID, ascertaining the logical IDs that have
16 been associated with it by users;
- 17 • computing a distribution of logical IDs for a given physical ID, the
18 distribution describing, for each logical ID, the number of times the
19 physical ID has been mapped thereto;
- 20 • adding to the distribution, an entry that corresponds to a current
21 trusted logical ID mapping;
- 22 • weighting the added entry; and
- 23 • computing, from the distribution, a most likely physical ID to logical
24 ID match.
- 25

18 In making out the rejection of this claim, the Office argues that its subject
19 matter is obvious over Milsted. Applicant respectfully disagrees and submits that
20 the Office has failed to establish a *prima facie* case of obviousness since Milsted
21 fails to disclose or suggest all of this claim's recited features.

22 The sections cited by the Office as disclosing the subject matter of this
23 claim are the same sections cited against claim 72. Accordingly, for the relevant
24
25

1 excerpts from Milsted, the Office is directed to the section above that discusses the
2 rejection of claim 72.

3 A review of these sections, and in point of fact the entirety of Milsted,
4 reveals that Milsted in no way discloses or suggests the subject matter of the
5 present claim. Milsted fails to make any mention of a physical ID to logical ID
6 mapping, much less the feature of computing a distribution of logical IDs for a
7 given physical ID, the distribution describing, for each logical ID, the number of
8 times the physical ID has been mapped thereto. Further, since Milsted fails to
9 disclose or suggest the computation of a distribution of logical IDs for a given
10 physical ID, it would be impossible for Milsted to further disclose or suggest the
11 claim features that logically depend from the computation of said distribution.
12 The features of this claim are simply absent from Milsted.

13 Accordingly, and for at least the reasons discussed above, the Office has
14 failed to establish a *prima facie* case of obviousness with respect to this claim.
15 This claim is allowable.

16 **Claims 75-76** depend from claim 74 and are allowable as depending from
17 an allowable base claim. These claims are also allowable for their own recited
18 features which, in combination with those recited in claim 74, are neither disclosed
19 nor suggested in the references cited and applied by the Office.

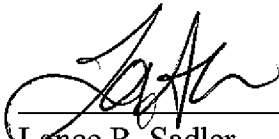
21 Conclusion

22 All of the claims are in condition for allowance. Accordingly, Applicant
23 requests a Notice of Allowability be issued forthwith. If the Office's next
24 anticipated action is to be anything other than issuance of a Notice of Allowability,
25

1 Applicant respectfully requests a telephone call for the purpose of scheduling an
2 interview.

3
4 Respectfully Submitted,

5
6 Dated: 11/20/06

7 By: 
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